

Exhibit 4

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CITY OF ALMATY, KAZAKHSTAN and BTA
BANK JSC,

Crossclaim Plaintiffs,

- against -

MUKHTAR ABLYAZOV, VIKTOR
KHRAPUNOV, ILYAS KHRAPUNOV, and
TRIADOU SPV S.A.,

Crossclaim Defendants.

ECF Case

No. 15 CV 05345 (AJN)

**TRIADOU’S SECOND REQUESTS
FOR THE PRODUCTION OF
DOCUMENTS DIRECTED TO
ALMATY AND BTA**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and this Court’s Local Civil Rules, Crossclaim-Defendant Triadou SPV S.A. (“Triadou”), by and through its undersigned counsel, hereby propounds its Second Requests for the Production of Documents directed to Crossclaim-Plaintiffs City of Almaty (“Almaty”) and BTA Bank JSC (“BTA”) (together, “Almaty/BTA”). Almaty/BTA are requested to respond in writing to these Requests and to produce the documents and tangible things designated below for inspection and copying at the offices of Blank Rome LLP, The Chrysler Building, 405 Lexington Avenue, New York, New York 10174-0208, within thirty (30) days after service thereof.

DEFINITIONS

1. “Almaty” means the City of Almaty, Kazakhstan, and its elected or appointed officials or employees.
2. “BTA” means BTA Bank JSC, and, where applicable, its officers, directors, employees, partners, corporate parent, subsidiaries, or affiliates.
3. The “California Actions” refers to *City of Almaty v. Khrapunov, et al.*, Case No. 2:14-cv-03650-FMO-CW, and *City of Almaty v. Khrapunov, et al.*, Case No. 2:15-cv-02628-FMO-

CW, filed in the Central District of California and referenced in paragraphs 29 and 115 of the Answer, Counterclaims, and Crossclaims.

4. “You” or “Your” means the party responding to these Requests.
5. “Communication” shall have the meaning set forth in Local Civil Rule 26.3(c)(1).
6. “Document” shall have the meaning set forth in Local Civil Rule 26.3(c)(2).
7. “Including” shall mean “including, but not limited to.”
8. “Concerning” shall have the meaning set forth in Local Civil Rule 26.3(c)(7).

INSTRUCTIONS

1. These Requests are for the production of all Documents in Your possession, custody, or control.
2. In defining the terms of discovery, You should use the definitions set forth above and, in the absence of a definition, the plain meaning of the words.
3. Each Request for a Document requires the production of the Document in its entirety, including all pages and attachments or exhibits, without redaction or expurgation.
4. If You object to any part of these Requests, (i) state each objection in specific detail and (ii) produce all responsive documents to which an objection does not apply.
5. If You claim all or any part of a Request is vague or ambiguous, identify the specific language You consider vague or ambiguous and state the interpretation of the language in question used to frame Your response.
6. If any Document responsive to these Requests is withheld from production, You shall furnish a log providing the information set forth in Local Civil Rule 26.2.
7. The present tense includes the past and future tenses. The terms “each” and “any” as used herein also mean “every.” Words in the masculine, feminine or neuter form shall include

each of the other genders. These Requests shall be construed in accordance with Local Civil Rule 26.3(d).

8. These Requests are continuing in nature and require amendment or supplementation if You obtain, directly or through Your agents, representatives, or attorneys, pertinent additional or different information or materials between the time that Your responses to these Requests are served until the trial in the above-captioned matter. If You do not have all of the information needed to completely respond to any Request, provide all Documents in Your possession, custody, or control, state that Your information is incomplete, identify the information You would need to make a complete response, and provide a supplemental production when You obtain the information necessary to do so.

9. You shall produce any Electronically Stored Information (“ESI”) in its native format, or as searchable, single-page Group IV .TIF files, and shall produce any and all metadata and load files associated with the produced ESI.

DOCUMENT REQUESTS

1. Documents Concerning Arcanum Global or any other Arcanum entity, including but not limited to Documents Concerning Your engagement or engagements with Arcanum Global or any other Arcanum entity, Documents prepared or obtained by Arcanum Global and provided to You, and Documents reflecting Communications between or among Almaty, BTA, and/or Arcanum Global.

2. Documents Concerning John Howell & Company, Ltd., including but not limited to Documents Concerning John Howell & Company, Ltd.’s efforts to trace the proceeds that Almaty and/or BTA allege were illegally taken from Almaty and/or BTA as referenced in Almaty/BTA’s Specific Objections and Response to Interrogatory No. 4 of Crossclaim Defendants Viktor Khrapunov and Ilyas Khrapunov’s First Set of Interrogatories; Documents reflecting John

Howell & Company, Ltd.'s knowledge of the results of the efforts to trace such proceeds as referenced in Almaty/BTA's Specific Objections and Response to Interrogatory No. 4 of Crossclaim Defendants Viktor Khrapunov and Ilyas Khrapunov's First Set of Interrogatories; Documents prepared or obtained by John Howell & Company, Ltd., and Documents reflecting Communications between or among Almaty, BTA, and/or John Howell & Company, Ltd.

3. Documents Concerning any Niel entities, such as Niel Telecom S.A., Niel Petroleum S.A., Niel Finance and Services S.A., and/or Niel Natural Resources Investments S.A., including but not limited to Communications between or among Almaty, BTA, and/or any of the Niel entities.

4. Documents Concerning Kevin Meyer, including Communications between or among Almaty, BTA, and/or Kevin Meyer.

5. Documents Concerning the following entities:

- Ramsay International S.A.
- Mossack Fonseca & Co.
- Amber Limited LLC
- Desimon Ventures Limited
- Beford Central Ltd.
- Mirren Investments Ltd.
- One Capital S.A.
- RPM-MARO LLC
- RPM USA LLC
- AMT Bank LLC
- Trasta Komerbanka
- Eurohypo AG
- LGT (Schweiz) AG
- Ural sib Bank OAO
- Rietumu Banka
- Commerzbank (Eurasija) SAO
- Rosbank OJSC

6. Documents produced to Almaty and/or BTA in response to, or in connection with, subpoenas issued in the above-captioned action or the California Actions.

Dated: New York, New York
March 16, 2017

BLANK ROME LLP

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of March, 2017, a true and correct copy of
Triadou's Second Requests for the Production of Documents Directed to Almaty and BTA,
was served by electronic mail on all of the following:

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